

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ANTHONY REID, *et al.*,
Plaintiffs,**

v.

**JOHN E. WETZEL, *et al.*,
Defendants.**

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CIVIL ACTION NO. 21-CV-5108

ORDER

AND NOW, this 29th day of December, because certain individuals listed as Plaintiffs in the caption of this case failed to sign the Complaint as required by Federal Rule of Civil Procedure 11,¹ and one individual named as a Plaintiff failed to submit a motion to proceed *in forma pauperis*, it is **ORDERED** that:

1. If they seek to proceed with claims asserted in his case, the following individuals listed as Plaintiffs in the caption of the Complaint are **DIRECTED** to **COMPLETE** the Declaration form attached to this Order, bearing an *original signature*, and **RETURN** it to the Court within thirty (30) days of the date of this Order to cure this deficiency with the Complaint:

- a. Aaron Jones
- b. Christopher Roney
- c. Ronald Gibson
- d. Jermont Cox
- e. Samuel Randolph
- f. Michael Pruitt
- g. Junius Burno
- h. Daniel Gwynn
- i. Tam Lee
- j. Paul Taylor Gamboa
- k. Jakeem Towles

¹ The Complaint was submitted without a handwritten signature from each person listed as a Plaintiff. Rather, only the first named person, Anthony Reid, signed the pleading. Rule 11(a) of the Federal Rules of Civil Procedure provides that “[e]very pleading, written motion, and other paper must be signed by at least one attorney of record in the attorney’s name – or by a party personally if the party is unrepresented.” Fed. R. Civ. P. 11(a). The United States Supreme Court has interpreted Rule 11(a) to require “as it did in John Hancock’s day, a name handwritten (or a mark handplaced).” *See Syville v. New York City of New York*, Civ. A. No. 20-0570, 2020 WL 2614705, at *1 (S.D.N.Y. May 15, 2020) (citing *Becker v. Montgomery*, 532 U.S. 757, 764 (2001)).

- l. Richard Laird
- m. Abraham Sanchez
- n. Marcel Johnson
- i. John Lewis

2. The Clerk of Court is **DIRECTED** to send a copy of this Order to each person listed in Paragraph 1 of this Order along with a copy of the attached Declaration form bearing that person's name and note the mailing on the docket. No summons shall issue at this time.

3. If he seeks to proceed with claims asserted in his case, Jakeem Towles is additionally **DIRECTED** to file a motion to proceed *in forma pauperis* with a certified copy of his prisoner account statement (or institutional equivalent) showing all deposits, withdrawals, and a current balance, from any correctional facility in which he was confined for the six-month period from May 15, 2021 to November 15, 2021, reflecting account activity from that time period.

4. If any person listed in Paragraph 1 of this Order fails to complete and return a Declaration form with an original signature within the thirty-day period, his case may be dismissed without further notice for failure to prosecute. If Jakeem Towles additionally fails to also comply with Paragraph 3 of this Order, his case may be dismissed without further notice for failure to prosecute.

5. The application to proceed *in forma pauperis* filed by Anthony Reid (ECF No. 1) is **GRANTED** pursuant to 28 U.S.C. § 1915.

6. The applications filed by all other persons listed as Plaintiffs in the Complaint are held in abeyance pending the receipt of the signed declaration described in Paragraph 1.

7. Anthony Reid, # BF-6567, shall pay the full filing fee of \$350 in installments, pursuant to 28 U.S.C. § 1915(b), regardless of the outcome of this case. The Court directs the Superintendent of SCI-Phoenix or other appropriate official to assess an initial filing fee of 20% of the greater of (a) the average monthly deposits to Reid's inmate account; or (b) the average monthly balance in Reid's inmate account for the six-month period immediately preceding the

filing of this case. The Superintendent or other appropriate official shall calculate, collect, and forward the initial payment assessed pursuant to this Order to the Court with a reference to the docket number for this case. In each succeeding month when the amount in Reid's inmate trust fund account exceeds \$10.00, the Superintendent or other appropriate official shall forward payments to the Clerk of Court equaling 20% of the preceding month's income credited to Reid's inmate account until the fees are paid. Each payment shall refer to the docket number for this case.²

8. The Clerk of Court is **DIRECTED** to send a copy of this order to the Superintendent of SCI-Phoenix.

9. The Complaint is **DEEMED** filed as to Plaintiff Anthony Reid.

BY THE COURT:

/s/ Jeffrey L. Schmehl

JEFFREY L. SCHMEHL, J.

² Reid's responsibility to pay the entire amount of the \$350 filing fee may change depending on whether any other person named as a Plaintiff in the Complaint is denied *in forma pauperis* status and required to pay the fee upon initiation of the case.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ANTHONY REID, *et al.*,
Plaintiffs,**

v.

**JOHN E. WETZEL, *et al.*,
Defendants.**

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CIVIL ACTION NO. 21-CV-5108

DECLARATION

1. I, Aaron Jones, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration. Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- a. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- b. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- c. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- d. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature

Date

Aaron Jones

Prisoner ID No. BL-0480

Address

City

State

Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ANTHONY REID, *et al.*,
Plaintiffs,**

v.

**JOHN E. WETZEL, *et al.*,
Defendants.**

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CIVIL ACTION NO. 21-CV-5108

DECLARATION

1. I, Christopher Roney, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration.

Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- a. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- b. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- c. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- d. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature

Date

Christopher Roney

Prisoner ID No. DF-1973

Address

City

State

Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ANTHONY REID, *et al.*,
Plaintiffs,**

v.

**JOHN E. WETZEL, *et al.*,
Defendants.**

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CIVIL ACTION NO. 21-CV-5108

DECLARATION

1. I, Ronald Gibson, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration.

Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- a. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- b. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- c. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- d. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature

Date

Ronald Gibson

Prisoner ID No. BQ-5220

Address

City

State

Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ANTHONY REID, *et al.*,
Plaintiffs,**

v.

**JOHN E. WETZEL, *et al.*,
Defendants.**

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CIVIL ACTION NO. 21-CV-5108

DECLARATION

1. I, Jermont Cox, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration.

Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- e. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- f. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- g. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- h. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature

Date

Jermont Cox

Prisoner ID No. CE-8242

Address

City

State

Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ANTHONY REID, *et al.*,
Plaintiffs,**

v.

**JOHN E. WETZEL, *et al.*,
Defendants.**

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CIVIL ACTION NO. 21-CV-5108

DECLARATION

1. I, Samuel Randolph, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration.

Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- i. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- j. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- k. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- l. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature

Date

Samuel Randolph

Prisoner ID No. FJ-5881

Address

City

State

Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ANTHONY REID, *et al.*,
Plaintiffs,**

v.

**JOHN E. WETZEL, *et al.*,
Defendants.**

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CIVIL ACTION NO. 21-CV-5108

DECLARATION

1. I, Michael Pruitt, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration.

Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- m. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- n. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- o. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- p. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature

Date

Michael Pruitt

Prisoner ID No. GF-1448

Address

City

State

Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ANTHONY REID, *et al.*,
Plaintiffs,**

v.

**JOHN E. WETZEL, *et al.*,
Defendants.**

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CIVIL ACTION NO. 21-CV-5108

DECLARATION

1. I, Junius Burno, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration.

Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- q. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- r. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- s. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- t. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature

Date

Junius Burno

Prisoner ID No. GZ-5987

Address

City

State

Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANTHONY REID, <i>et al.</i>,	:	
Plaintiffs,	:	
	:	
v.	:	CIVIL ACTION NO. 21-CV-5108
	:	
JOHN E. WETZEL, <i>et al.</i>,	:	
Defendants.	:	

DECLARATION

1. I, Daniel Gwynn, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration. Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- u. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- v. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- w. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- x. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature

Date

Daniel Gwynn

Prisoner ID No. CW-5713

Address

City

State

Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANTHONY REID, <i>et al.</i>,	:	
Plaintiffs,	:	
	:	
v.	:	CIVIL ACTION NO. 21-CV-5108
	:	
JOHN E. WETZEL, <i>et al.</i>,	:	
Defendants.	:	

DECLARATION

1. I, Tam Le, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration. Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- y. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- z. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- aa. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- bb. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

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Signature	Date		
 <hr/>	 <hr/>		
Tam Le	Prisoner ID No. MT-8214		
 <hr/>			
Address	City	State	Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ANTHONY REID, *et al.*,
Plaintiffs,**

v.

**JOHN E. WETZEL, *et al.*,
Defendants.**

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CIVIL ACTION NO. 21-CV-5108

DECLARATION

1. I, Paul Taylor Gamboa, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration.

Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- cc. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- dd. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- ee. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- ff. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature

Date

Paul Taylor Gamboa

Prisoner ID No. BT-2525

Address

City

State

Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANTHONY REID, *et al.*,
Plaintiffs,

v.

JOHN E. WETZEL, *et al.*,
Defendants.

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CIVIL ACTION NO. 21-CV-5108

DECLARATION

1. I, Jakeem Towles, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration.

Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- gg. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- hh. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- ii. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- jj. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature

Date

Jakeem Towles

Prisoner ID No. KP-2038

Address

City

State

Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANTHONY REID, <i>et al.</i>,	:	
Plaintiffs,	:	
	:	
v.	:	CIVIL ACTION NO. 21-CV-5108
	:	
JOHN E. WETZEL, <i>et al.</i>,	:	
Defendants.	:	

DECLARATION

1. I, Richard Laird, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration. Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- kk. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- ll. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- mm. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- nn. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature	Date		
Richard Laird	Prisoner ID No. AT-0811		
Address	City	State	Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ANTHONY REID, *et al.*,
Plaintiffs,**

v.

**JOHN E. WETZEL, *et al.*,
Defendants.**

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CIVIL ACTION NO. 21-CV-5108

DECLARATION

1. I, Abraham Sanchez, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration.

Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- oo. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- pp. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- qq. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- rr. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature

Date

Abraham Sanchez

Prisoner ID No. HZ-5535

Address

City

State

Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANTHONY REID, <i>et al.</i>,	:	
Plaintiffs,	:	
	:	
v.	:	CIVIL ACTION NO. 21-CV-5108
	:	
JOHN E. WETZEL, <i>et al.</i>,	:	
Defendants.	:	

DECLARATION

1. I, Marcel Johnson, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration.

Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- ss. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- tt. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- uu. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- vv. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature

Date

Marcel Johnson

Prisoner ID No. MB-9312

Address

City

State

Zip Code

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ANTHONY REID, *et al.*,
Plaintiffs,**

v.

**JOHN E. WETZEL, *et al.*,
Defendants.**

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CIVIL ACTION NO. 21-CV-5108

DECLARATION

1. I, John Lewis, am a plaintiff in this action and I respectfully submit this Declaration in response to the Court's Order which accompanied this form Declaration. Pursuant to that Order, I have signed this Declaration as proof that I have read the Complaint in this action (ECF No. 2) and that I am the Plaintiff in this action.

2. Under Rule 11(b) of the Federal Rules of Civil Procedure, I certify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- ww. the Complaint is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- xx. the claims and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;
- yy. the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- zz. the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

Signature

Date

John Lewis

Prisoner ID No. JG-0040

Address

City

State

Zip Code